

Remedium

Robert J. Medler
Director
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U.S. Environmental Protection Agency
EPR-SR
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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – July 2009

Dear Bonnie:

This progress report describes work completed during the month of July 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during the month of July.

A. ACTIONS TAKEN

- Continued to collect flow data and water samples from ISCO automatic samplers/flow sensors at LRC-06, LRC-02, and CC-02. Samples are collected in accordance with specifications in Remedial Investigation for Operable Unit 3, Libby Asbestos Superfund Site, Phase III Sampling and Analysis Plan (Phase III SAP).
- Began Phase III activity-based sampling (ABS) on July 6, 2009.
- Discontinued flow-based sampling of surface water at LRC-06, LRC-02, and CC-02 on July 31, 2009, pending resolution of analytical issues related to sample processing by the laboratory

B. SAMPLING RESULTS

Samples collected during the first three rounds of ABS were consistently overloaded with dust and cannot be directly analyzed. Pilot testing of reduced flow rates and reduced activity durations was conducted during the fourth week (July 27-31). During the week of August 10-14, pilot testing will continue under Revision 3 of the SAP, issued by EPA on August 6, 2009.

Analytical results for surface water collected from LRC-06 on July 24, 2009 indicate that LA fiber counts in sonicated and ozonated samples are from 2.8 to 20 times those of untreated "grab" samples.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Continue Phase III ABS after additional pilot testing under Revision 3 of the SAP during the week of August 10-August 14.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- Sonication and ozonation of surface water samples collected from LRC-06, LRC-02, and CC-02 appear to significantly increase the LA fiber counts over "natural" concentrations. The surface water sampling program will be re-started in Spring 2010, pending further analysis of the relationship between sample processing and fiber count.
- The 8.0 liter-per-minute (LPM) flow rate and the activity durations specified in the final Phase III ABS SAP result in significant dust overloading of the sample cassettes. Pilot tests of reduced flow rates and reduced activity durations will be aimed at collecting samples that are not overloaded and can be directly analyzed.

Parametrix

The following is a summary of the actions taken and progress made during the month of July.

A. ACTIONS TAKEN

- Prepared permit and submitted applications for aquatic, small mammal programs.
- Initiate revisions, work through issues associated with small mammal SOP with EPA.
- Initiate revisions, work through issues associated with histology SOP with EPA.
- Order scintillation vials for weighing study required by EPA related to finalizing small mammal SOP approach.
- Parametrix research lab conducted weighing study and reported findings (provided to Remedium, EPA).
- Discussions with Remedium on fiber loss issues and potential impacts on pilot rainbow trout study.
- Prepare final fish trap and velocity SOPs and submitted to Remedium and EPA.
- Revised pebble and stream cover SOPs per EPA comments.
- Initiated ordering of some safety supplies for pending field work.
- Prepared Small Mammal Reconnaissance Technical Memorandum.
- Addressed questions on Reconnaissance Memo from EPA.
- Equipment preparation and conduct of barrier survey.

- Reviewed Final Phase III SAP.
- Reviewed Final Phase III SOPs.
- Submitted questions and clarifications for Phase III SAP activities to EPA.
- Prepared EPA-requested SOPs to support Phase III SAP.
- Obtained supplies for small mammal necropsy workshop.
- Conducted small mammal necropsy workshop with wildlife histopathologist.
- Prepared communication related to issues arising from necropsy workshop for discussion with EPA.
- Conducted small mammal field reconnaissance at OU3 and reference areas. and
- Initiated small mammal permitting and IUCAC applications.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Address final comments and finalize remaining Phase III SAP SOPs.
- Obtain scientific collection permit and IACUC application approvals.
- Resolve fiber loss issues with EPA.
- Submit costs on 2009 aquatic program to Remedium.
- Submit Barrier Survey Technical Memorandum.
- Obtain cost estimate from amphibian bioassay laboratory (Fort Labs).
- Mobilize and conduct small mammal tissue collection program.
- Initiate rainbow trout pilot spiking study.
- Mobilize and initiate 2009 aquatic field program.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- Resolve fiber loss issues ahead of Pilot Rainbow Trout Study initiation.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



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Remedium Group, Inc.

cc: Michael DeDen - MWH
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